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Attorneys for Bethesda Softworks LLC, Mark Realty, and  
SimpleTech by Hitachi Global Storage Technologies,  
f/k/a "SimpleTech, a Fabrik Company"

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
(Richmond Division)**

<b>In re:</b>	*	<b>Chapter 11</b>
	*	
<b>CIRCUIT CITY STORES, INC., et al.,</b>	*	<b>Case No. 08-35653 (KRH)</b>
	*	
<b>Debtors.</b>	*	<b>(Jointly Administered)</b>
* * *	*	* * *

**AMENDED VERIFIED STATEMENT PURSUANT TO  
RULE 2019 OF THE BANKRUPTCY CODE**

McKenna Long & Aldridge LLP (the "MLA Firm"), pursuant to Rule 2019 of the  
Federal Rules of Bankruptcy Procedure, hereby files this Amended Verified Statement.

1. Name and address of creditors/parties in interest represented:

Bethesda Softworks LLC  
c/o McKenna Long & Aldridge LLP  
John G. McJunkin, Esq.  
1900 K Street, NW  
Washington, DC 20006  
Phone: 202-496-7312  
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Marc Realty, 120 Orchard LLC, 427 Orchard LLC and FT Orchard LLC  
c/o McKenna Long & Aldridge LLP  
John G. McJunkin, Esq.

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2. Nature and amount of claim or interest and time of acquisition thereof unless it is alleged to have been acquired more than one year prior to the filing of the petition:

A. Bethesda Softworks LLC holds, or may hold, reclamation claims (currently estimated to be \$3,848,875.72), Bankruptcy Code Section 503(b)(9) claims (currently estimated to be \$3,838,606.40), general unsecured claims, and/or post-petition administrative claims (amounts depend, in part, upon determinations with respect to reclamation and Section 503(b)(9) claim determinations) for goods delivered to the Debtor prior and/or subsequent to the Petition Date, in this Chapter 11 case.

B. Marc Realty, 120 Orchard LLC, 427 Orchard LLC and FT Orchard LLC (collectively, "Marc Realty") are landlords and creditors which held general unsecured claims, post-petition administrative claims (currently estimated to be \$55,626.72) and/or other rights arising from leases and/or subleases which had not expired as of the Petition Date in this Chapter 11 case. Some or all of these claims were guaranteed by a non-Debtor third party (the "Guarantor"). In connection with certain payments made by the Guarantor to Marc Realty, the claims of Marc Realty are being pursued by the Guarantor, which is represented by other

counsel.

C. SimpleTech by Hitachi Global Storage Technologies, holds, or may hold, reclamation claims (currently estimated to be \$1,154,919.12), Bankruptcy Code Section 503(b)(9) claims (currently estimated to be \$224,330.32), general unsecured claims, and/or post-petition administrative claims (amounts depend, in part, upon determinations with respect to reclamation and Section 503(b)(9) claim determinations) for goods delivered to the Debtor prior and/or subsequent to the Petition Date in this Chapter 11 case.

3. A recital of pertinent facts and circumstances in connection with the employment of the entity or entities at whose instance, directly or indirectly, the employment was arranged:

A. Certain members of the MLA Firm, while at their previous law firm, represented Bethesda Softworks LLC (and/or one or more affiliated entities) as a client on a variety of matters. Shortly after the Petition date in these Chapter 11 cases, they were requested by Bethesda Softworks LLC to represent it in this Chapter 11 case.

B. Those same members of the MLA Firm, while at their previous law firm, were colleagues of the Chicago, Illinois counsel for Marc Realty, et al., Colleen McManus, Esq. who requested that they serve as Virginia counsel for her firm's clients in this Chapter 11 case.

C. Those same members of the MLA Firm, while at their previous law firm, knew and worked over the past ten years with the Costa Mesa, California counsel for SimpleTech by Hitachi Global Storage Technologies, Lei Lei Wang Ekvall, who requested that they serve as Virginia counsel for her firm's clients in this Chapter 11 case.

4. With reference to the time of the employment of the entity, the organization or formation of the committee, or the appearance in the case, the amounts of claims or interests

owned by the entity, the times when acquired, the amounts paid therefor, and any sales or other disposition thereof.

This is not applicable to the MLA Firm.

Dated: December 16, 2009

/s/ John G. McJunkin

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#### **VERIFICATION**

Pursuant to 28 U.S.C. § 1746, I, John G. McJunkin, of the law firm of McKenna Long & Aldridge LLP, declare under penalty of perjury that I have read the foregoing statement and that it is true and correct to the best of my knowledge, information and belief.

/s/ John G. McJunkin

John G. McJunkin

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing document was served by electronic means through the ECF system on this 16<sup>th</sup> day of December, 2009.

/s/ John G. McJunkin

John G. McJunkin